



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 20, 2021

VIA ECF AND EMAIL

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Nicholas Truglia, 19 Cr. 921 (AKH)*

Dear Judge Hellerstein:

The Government writes on behalf of the parties to respectfully request that the Court adjourn the conference in this case currently scheduled for September 23, 2021, for approximately two weeks. The parties have engaged in and continue to engage in extensive discussions concerning a pretrial resolution of this case. The parties believe that they are close to reaching such a resolution but do not anticipate doing so by September 23. Accordingly, the parties request the additional time to continue and hopefully conclude their plea discussions.

If the Court grants this request, the Government further requests that the Court exclude time under the Speedy Trial Act between September 23, 2021, and the conference date set by the Court. The ends of justice served by granting such an exclusion outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). An exclusion is warranted in order to allow additional time for the parties to engage in discussions of a potential pretrial resolution of this case. The defendant consents to this request.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By:
Timothy Capozzi
Assistant United States Attorney
(212) 637-2404

cc: Jeffrey Udell, Esq.
Adam Cohen, Esq.